

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

Exigent Landscaping, LLC,
Debtor.

Case No. 23-46912-TJT
Chapter 7
Hon. Thomas J. Tucker

MOTION FOR ORDER AUTHORIZING SURCHARGE

Jurisdiction

1. Exigent Landscaping, LLC d/b/a Exigent Design and Build (“Debtor”) filed a petition for relief under Chapter 11 of the U.S. Bankruptcy Code on August 7, 2023.
2. The Chapter 11 case was converted to a Chapter 7 on February 12, 2024 (Docket #152).
3. Chapter 7 Trustee Mark H. Shapiro (“Trustee”) brings this motion under 11 U.S.C. § 506(c) and Fed. R. Bankr. P 9014.
4. The Court has jurisdiction over this Chapter 7 bankruptcy case. *See* 28 U.S.C. § 1334. The case, and all related proceedings and contested matters, have been referred to this bankruptcy court for determination. *See* 28 U.S.C. §§ 157(a) and 157(b); and LR 83.50 (E.D. Mich.).
5. This is a core proceeding over which this Court has authority to enter a final order. *See* 28 U.S.C. 28 U.S.C. § 157(b)(2)(A) (matters concerning

administration of the estate) and § 157(b)(2)(O) (other proceedings affecting the liquidation of assets of the estate).

Background

6. Before this case was filed, the Small Business Administration (“SBA”) extended a loan (“Loan”) to the Debtor.

7. In exchange for the Loan, the Debtor granted the SBA a security interest in various assets, including the following—

All tangible and intangible personal property, including, but not limited to: (a) inventory, (b) equipment, (c) instruments, including promissory notes (d) chattel paper, including tangible chattel paper and electronic chattel paper, (e) documents, (f) letter of credit rights, (g) accounts, including health-care insurance receivables and credit card receivables, (h) deposit accounts, (i) commercial tort claims, (j) general intangibles, including payment intangibles and software and (k) as extracted collateral as such terms may from time to time be defined in the Uniform Commercial Code. The security interest Borrower grants includes all accessions, attachments, accessories, parts, supplies and replacements for the Collateral, all products, proceeds and collections thereof and all records and data relating thereto.

8. The SBA perfected its security interest with the filing of a UCC Financing Statement with the Michigan Department of State on July 23, 2020, Filing Number 20200723001030-0.

9. The SBA is owed \$550,362.00 (“Indebtedness”).

Surcharge Proposal

10. Under 11 U.S.C. § 506(c), “[t]he trustee may recover from property securing an allowed secured claim the reasonable, necessary costs and expenses of preserving, or disposing of, such property to the extent of any benefit to the holder of such claim.”

11. The Trustee and SBA have agreed that the Trustee may liquidate certain Collateral, specifically identified in Exhibit A (“SBA Collateral”) and surcharge the proceeds as follows:

1. First, to pay any tax liens and personal property taxes assessed against the SBA Collateral and any tax liabilities incurred from the liquidation of the SBA Collateral.
2. Second, 33% of the balance remaining from the liquidation of the Collateral, after taxes are paid, will be retained (“Retention”) by the bankruptcy estate free and clear of any lien or security interest of the SBA Collateral.
3. Third, all remaining proceeds will be paid to the SBA and applied to its Indebtedness until paid in full.

Request for Relief

The Trustee requests that this Court grant this motion; enter an Order in the form attached; and provide such further relief as the Court deems appropriate.

Steinberg Shapiro & Clark

/s/ Tracy M. Clark (P60262)

Attorney for Trustee

25925 Telegraph Rd., Suite 203

Southfield, MI 48033

(248) 352-4700

clark@steinbergshapiro.com

Date: March 6, 2024

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

Exigent Landscaping, LLC,
Debtor.

Case No. 23-46912-TJT
Chapter 7
Hon. Thomas J. Tucker

_____ /

ORDER AUTHORIZING SURCHARGE

This matter is before the Court on the Trustee's Motion for Order Authorizing Surcharge ("Motion"). Notice of the Motion was served on interested parties, and no objections were timely filed. The Court, having reviewed the Motion and being fully advised in the premises, finds good cause to enter this Order.

IT IS ORDERED as follows:

A. The Trustee may liquidate the SBA Collateral¹ free and clear of any security interest of SBA.

B. To the extent that the Trustee is able, through a sale of the SBA Collateral, to generate funds payable toward the secured lien of the SBA, a surcharge will be imposed and the proceeds distributed as follows:

1. First, to pay any tax liens and personal property taxes assessed against the SBA Collateral and any tax liabilities incurred from the liquidation of the SBA Collateral.

¹ Capitalized terms used but not defined herein shall have the same meaning as those in the Motion.

2. Second, 33% of the balance remaining from the liquidation of the SBA Collateral, after taxes are paid, will be retained (“Retention”) by the bankruptcy estate free and clear of any lien or security interest of the SBA.
3. Third, all remaining proceeds will be paid to the SBA and applied to its Indebtedness until paid in full.

C. The Retention will be used by the Trustee to pay administrative fees and expenses and unsecured claims in the manner prescribed by the bankruptcy code.

D. To the extent that another secured creditor holds a higher priority security interest in the SBA Collateral, the SBA Collateral will not be liquidated by the Trustee unless the higher priority secured creditor consents or there is equity in the collateral over and above the amount owed the higher priority secured creditor on that collateral.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

Exigent Landscaping, LLC, xx-xxx5176
dba Exigent Design and Build
13246 23 Mile Road
Shelby Township, MI 48315

Debtor.

Case No. 23-46912-TJT
Chapter 7
Hon. Thomas J. Tucker

NOTICE OF MOTION FOR ORDER AUTHORIZING SURCHARGE

Chapter 7 Trustee Mark H. Shapiro filed a motion for authority to surcharge proceeds anticipated from a sale of the Debtor's assets, which are subject to the secured lien of the Small Business Administration ("SBA"). The SBA's collateral consist of the following:

-Raw materials (gravel, sand, pavers)	-5 Small Tampers
-Misc. office furniture, incl conference table, 4 desks, 12 chairs	-5 Stihl saws
-Office equipment, incl computers, printers, TV	-Rebar cutter and tier
-Trailers	-2 Compressors
-2 Vacuum Paver Lifters	-Misc. pool equipment, supplies, and hand tools
-Topsoil Screener	-Mud Buggy
-2 Toro Dingos	-Cat 308e2 Excavator (subject to \$15,000 lien of CAT)
-Large Tamper	

To the extent that the Trustee is able, through a sale of the SBA collateral, to generate funds payable toward the secured lien of the SBA, a surcharge will be imposed and the proceeds distributed as follows: first, to pay any tax liens and personal property taxes assessed against the SBA collateral and any tax liabilities incurred from the liquidation of the SBA collateral; second, 33% of the balance remaining from the liquidation of the SBA collateral, after taxes are paid, will be retained ("Retention") by the bankruptcy estate free and clear of any lien or security interest of the SBA; and third, all remaining proceeds will be paid to the SBA and applied to its Indebtedness until paid in full. The Retention will be used

by the Trustee to pay administrative fees and expenses and unsecured claims in the manner prescribed by the bankruptcy code. To the extent that another secured creditor holds a higher priority security interest in the SBA collateral, the SBA collateral will not be liquidated by the Trustee unless the higher priority secured creditor consents or there is equity in the collateral over and above the amount owed the higher priority secured creditor on that collateral.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the Trustee's motion, or if you want the Court to consider your views on the motion, then within 14 days from the date of service of this notice, you or your attorney must:

File with the Court a written objection or request for hearing, explaining your position at:¹

U.S. Bankruptcy Court
211 West Fort Street
Detroit, Michigan 48226

If you mail your objection or request for hearing to the Court for filing, you must mail it early enough so the Court will receive it before the 14-day period expires. All attorneys are required to file pleadings electronically.

You must also send a copy to:

Tracy M. Clark, Esq.
Steinberg Shapiro & Clark
25925 Telegraph Rd., Suite 203
Southfield, Michigan 48033

If an objection or request for hearing is timely filed, the clerk will schedule a hearing on the motion and you will be served with a notice of the date, time, and location of the hearing.

¹ Objection or request for hearing must comply with Fed. R. Civ. P. 8(b), (c), and (e).

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Steinberg Shapiro & Clark

/s/ Tracy M. Clark (P60262)
Attorney for Trustee
25925 Telegraph Rd., Suite 203
Southfield, MI 48033
(248) 352-4700
clark@steinbergshapiro.com

Date: March 6, 2024

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

Exigent Landscaping, LLC,

Debtor.

Case No. 23-46912-TJT
Chapter 7
Hon. Thomas J. Tucker

_____ /

CERTIFICATE OF SERVICE

I certify that on March 6, 2024, I served copies as follows:

Document Served:	Notice of Motion for Order Authorizing Surcharge
Served Upon:	All non-ECF parties listed on attached Official Court Matrix
Method of Service:	First Class Mail

/s/ Christine T. Leach, Legal Assistant
Steinberg Shapiro & Clark
Attorneys for Trustee
25925 Telegraph Rd., Suite 203
Southfield, MI 48033
(248) 352-4700
cleach@steinbergshapiro.com

Label Matrix for local noticing
0645-2
Case 23-46912-tjt
Eastern District of Michigan
Detroit
Wed Mar 6 13:14:40 EST 2024

AG Gas Service
27231 Doxtator
Dearborn Heights, MI 48127-4903

Ally Bank c/o AIS Portfolio Services, LLC
4515 N. Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

American Express
PO Box 650448
Dallas, TX 75265-0448

Angela Serrano
181 Linda Lane
Bloomfield Hills, MI 48304-2819

Arlington Masonry Supply
7500 23 Mile Road
Shelby Twp, MI 48316-4422

Melvin Babi
BABI & BABI LAW, P.L.L.C.
39500 High Pointe Blvd.
Suite 155
Novi, MI 48375-5500

Robert N. Bassel
P.O. Box T
Clinton, MI 49236-0018

Brandon Heitmann
60749 Forrest Creek Drive
Washington, MI 48094-1846

Caterpillar Financial Services Corp.
2120 West End Avenue
Nashville, TN 37203-5341

23 Mile Storage, LLC
c/o Tommy Haji
965 Wanda
Suite E
Detroit, MI 48220-2959

Alex Boyd and Rebecca Boyd
c/o John F. Harrington
30500 Van Dyke Ave
Ste 200
Warren, MI 48093-2109

(p)AMERICREDIT FINANCIAL SERVICES DBA GM FINAN
PO BOX 183853
ARLINGTON TX 76096-3853

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Aqua Hall
2992 Gramer Road
Webberville, MI 48892-8700

Auto Owners Insurance
6101 Anacapri Blvd
Lansing, MI 48917-3994

Barajas Enterprise
1217 Chandler Ave.
Lincoln Park, MI 48146-2007

(p)BILL
6220 America Center Dr.
Suite 100
San Jose, CA 95002

Calambas Pool Service
Hector Orozco
2654 Pearl St
Detroit MI 48209-3700

Caterpillar Financial Services Corporation
James A. Plemmons
Dickinson Wright PLLC
500 Woodward Ave., Suite 4000
Detroit, MI 48226-5403

24 Capital, LLC
936 S.W. 1st Ave. Ste.271
Miami, FL 33130-4520

Ally Bank
AIS Portfolio Services, LLC
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

AmeriCredit Financial Services, Inc. dba GM
P O Box 183853
Arlington, TX 76096-3853

Angela Londono, a/k/a Angela Serrano
c/o David M. Eisenberg, Esq.
28400 Northwestern Hwy., 2nd Floor
Southfield, MI 48034-8348

Aqua Haul
2992 Gramer Rd
2992 Gramer Rd
Webberville, MI 48892-8700

BMO Bank N.A.
1625 W. Fountainhead Pkwy
Tempe, AZ 85282-2371

Barajas Enterprise LLC
1217 Chandler Avenue, Lincoln Park, MI,
1217 Chandler Avenue, Lincoln Park, MI,
Lincoln Park, MI 48146

Jason Brainer
Dickinson Wright PLLC
2600 W. Big Beaver Rd
Suite 300
Troy, MI 48084-3312

Kelley Callard (UST)
United States Trustee
211 West Fort Street
Suite 700
Detroit, MI 48226-3263

Changhua Wang and Bin He
c/o Doron Yitzchaki, Esq.
Dickinson Wright PLLC
350 S. Main Street, Suite 300
Ann Arbor, MI 48104-2131

Scott R. Cheatham
Adams and Reese LLP
701 Poydras St. Suite 4500
New Orleans, LA 70139-4596

Chris Burke
15182 Cranbrook Court
Utica, MI 48315-2127

Chris Seitz
1415 Greenleaf
Royal Oak, MI 48067-1174

Citizens Bank, N.A.
c/o Michael I. Zousmer, Esq.
Zousmer Law Group PLC
4190 Telegraph Rd., Ste. 3000
Bloomfield Hills, MI 48302-2082

(p)CITIZENS BANK N A
ATTN BANKRUPTCY TEAM
ONE CITIZENS BANK WAY
JCA115
JOHNSTON RI 02919-1922

Citizens Bank, N.A.
c/o Michael I. Zousmer, Esq.
Zousmer Law Group PLC
4190 Telegraph Rd., Ste. 3000
Bloomfield Hills, Michigan 48302-2082

Tracy M. Clark
Steinberg Shapiro & Clark
25925 Telegraph Rd.
Suite 203
Southfield, MI 48033-2527

Classic Pools
14073 Southwoods Court
Southgate, MI 48195-3739

Congil Truck Lines
6216 West MINSTER DRIVE
P.O. 850, Lambeth Stn
London ON N6P 1N6

Congil Truck Lines Ltd.
6216 Westminster Dr
London, ON N6P 1R2

Connelly Crane Rental Corp
12635 Marion
Redford, MI 48239-2652

Dan Hagy
4582 Lakshore Road
Fort Gratiot, MI 48059-3527

Dana Caran
17742 Hogan Dr.
Macomb, MI 48042-1775

Daniel B. Hagy
4582 Lakeshore Drive
4582 Lakeshore Drive
Fort Gratiot, MI 48059-3527

Daniel Carter
c/o John F. Harrington
30500 Van Dyke Ave
Ste 200
Warren, MI 48093-2109

Daniel DiCicco
Ahern & Kill PC
355 S. Old Woodward Ave, Ste 210
Birmingham, MI 48009-6203

Dany Batti
101 W. Big Beaver Rd.
Suite 104
Troy, MI 48084-5253

Demetrios James Minnie Papageorgiou
4882 Riverchase Drive
Troy, MI 48098-4185

Greg Dickinson
United States Attorney's Office
211 W. Fort Street
Ste. 2001
Detroit, MI 48226-3220

Doron Yitzchaki
Dickinson Wright PLLC
350 South Main Street, Suite 300
Ann Arbor, MI 48104-2131

EBF Holdings, LLC d/b/a Everest Business Fun
c/o Michael W. Davis, Esq.
601 S. Figueroa Street, Suite 2130,
Los Angeles, CA 90017-5729

ERC Specialist
560 East Timpanogos Circle
Orem, UT 84097-6225

ERC Specialists, LLC
560 E Timpanogos Circle
Orem, UT 84097-6225

David Eisenberg
Maddin, Hauser, Roth & Heller, P.C.
28400 Northwestern Highway
Second Floor
Southfield, MI 48034-1839

Elena Morales
66591 Campground Road
Washington, MI 48095-1853

Eli Zahka
19052 Chaumont Way
Monroe, MI 48162

Everest Businss Funding
102 W 38th Street
6th Floor
New York, NY 10018-3664

Exigent Landscaping, LLC
13246 23 Mile Road
Shelby Township, MI 48315-2712

Fantastic Pools LLC
1615 Myron
Lincoln Park, MI 48146-3829

First Foundation Bank
5403 Olympic Drive NW
Gig Harbor, WA 98335-1853

Fleet Masters Equipment
2375 Dixie Hwy
Waterford, MI 48328-1811

Fundbox Financing
6900 Dallas Parkway
Suite 700
Plano, TX 75024-7188

GM Financial
PO Box 183834
Arlington, TX 76096-3834

Gateway Engineering
8155 Annsbury Dr.
Suite 109
Utica, MI 48316-1914

Genniver Jameel
7178 Lasher Road
Bloomfield Hills, MI 48301-4044

Geoff Wilson
7335 East Greenwich
Bloomfield Hills, MI 48301-3919

Grace Transport
9825 Alondra Ave
Pharr, TX 78577-8445

James Haney
821 Alexander Road
Suite 200
Princeton, NJ 08540-6352

John F Harrington
Law Offices John F. Harrington
22162 Chaucer Court
Suite 200
Macomb Township, MI 48044-3897

John F Harrington
Law Offices John F. Harrington
30500 Van Dyke Avenue
Suite 200
Warren, MI 48093-2109

John F. Harrington
30500 Van Dyke Avenue, Suite M-200
Warren, MI 48093-2104

Ernest Hassan
Stevenson & Bullock, P.L.C.
26100 American Drive
Suite 500
Southfield, MI 48034-6184

Hecktor Orozco
6254 Peral Street
Detroit, MI 48209

Jennifer Hernandez
49145 Cranbrook
Macomb, MI 48044-1543

Jacob Daniel High
6440 Lake Meadow Dr.
Waterford, MI 48327-1781

Peter Hutchens
Bredernitz, Wagner & Co.
109 W Clinton St
Howell, MI 48843-1598

IOU Central Inc. d/b/a IOU Financial
Inc.
c/o Bret T. Thrasher
1170 Peachtree Street NE, Suite 1925
Atlanta, GA 30309-7677

IOU Central, Inc. d/b/a IOU Financial, Inc.
c/o Aubrey Thrasher, LLC
12 Powder Springs Street
Suite 240
Marietta, GA 30064-7205

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Internal Revenue Service
Centralized Insolvency Operation
P.O. Box 7346
Philadelphia, PA 19101-7346

Ivan Salem
66 W Millington Rd.
Fostoria MI 48435-9528

J & H Transportation Inc
39999 Garfield Rd
Clinton Township, MI 48038-4098

J&H Transportation Co.
37580 Mound Road
Sterling Heights, MI 48310-4122

James Shamas
3927 Forster Lane
Utica, MI 48316-3802

Jason Khano
12 Powder Springs Street
Suite 240
Marietta, GA 30064-7205

Jeff English
53200 Van Dyke Ave.
Shelby Twp, MI 48316-2598

Jeff Tripoli
5480 Carrollton Court
Rochester, MI 48306-2393

Jennifer Hernandez
49145 Cranbrook Drive
Macomb, MI 48044-1543

Joe Hebeke and Angela Hebeke
6435 Creekside Lane
Utica, MI 48316-5394

Joe Regalado
14127 Kings Park Court
Utica, MI 48315-4159

John Benincasa
20011 Sycamore Drive
Macomb, MI 48044-5725

John F Harrington
30500 Van Dyke Avenue
Suite 200
Warren, MI 48093-2109

(p)KSERVICING WIND DOWN CORP
ATTN NICOLE MANOS
3370 N HAYDEN ROAD #123
PMB 681
SCOTTSDALE AZ 85251-6632

Anthony Wayne Kahn
33110 Grand River Avenue
Farmington, MI 48336-3120

Anthony Wayne Kahn
Law Office of Anthony Wayne Kahn
33110 Grand River Avenue
Farmington, MI 48336-3120

Kelley Wallis
5818 Carmen Court East
West Bloomfield, MI 48324-2912

Kelsey Acho
32721 White Oaks Trail
Franklin, MI 48025-2563

Kirk, Huth, Lange & Badalamenti, P.L.C.
19500 Hall Rd #100
Clinton Township, MI 48038-5317

Kristen Toma
20652 Breezeway Dr.
Macomb, MI 48044-3518

Lee Cameron
49337 Marte
New Baltimore, MI 48047

MacAllister Machinery Co., Inc
c/o CRF Solutions
PO Box 1389
Simi Valley, CA 93062-1389

Macallister Rental
6300 South Eastern Ave
Indianapolis, IN 46203-5828

Malek Shamaya
19429 Gold River
Macomb, MI 48044-4251

Marc Piper
6970 Valley Spring Dr.
Bloomfield Twp, MI 48301-2847

Marco
42945 Whitestone St.
Northville, MI 48168-2061

Maria Ashkar
47681 Manorwood Drive
Northville, MI 48168-8471

Matt Decoster
37676 Huron Pointe Drive
Harrison Township, MI 48045-2823

Matt Grant
1200 Lone Pine Road
Bloomfield Hills, MI 48302-2816

Matt Martin
1422 Pueblo Court
Milford, MI 48381-2978

Megan Madaus
18210 Fairway Dr.
Detroit, MI 48221-2707

Michael J. Balian
100 W. Big Beaver Rd.
Ste 333
Troy, MI 48084-5283

Michele Breteton
49876 Baker Court
Macomb, MI 48044-1525

Michigan Department of Treasury
Collections/Bankruptcy Unit
P.O. Box 30168
Lansing, MI 48909-7668

Anthony James Miller
20700 Civic Center Drive
Suite 420
Southfield, MI 48076-4140

Moe Saad
921 Crescent Drive
Dearborn, MI 48124-1209

Mohamed Saad
c/o Osipov Bigelman, P.C.
20700 Civic Center Dr., Ste. 420
Southfield, MI 48076-4155

Nacy Afr
1085 Glengarry Circle East
Bloomfield Hills, MI 48301-2214

Natalie Powers
697 Sunningdale
Grosse Pointe, MI 48236-1627

Nick Pinozzi
55520 Whitney Ct.
Utica, MI 48315-6668

Oakland Fuels
3943 Airport Road
Waterford, MI 48329-1308

Yuliy Osipov
Osipov Bigelman, P.C.
20700 Civic Center Drive, Ste. 420
Southfield, MI 48076-4140

S. Thomas Padgett
DeBrincat Padgett
27780 Novi Road
Suite 225
Novi, MI 48377-3402

Partha Nadi
3514 Pine Estates
Bloomfield Hills, MI 48302

Pawnee Leasing Corporation
c/o Ali
654 Amherst Road
Suite 320
Sunderland, MA 01375-9420

Peterson Brothers Co.
9680 Grineel Ave
Detroit, MI 48213-1149

Ratnesh Mehra
232 Forest Ave.
Royal Oak, MI 48067-1875

Rock Bottom Stone Supply
PO Box 190081
Burton, MI 48519-0081

Rock Botton
4057 S Dort Hwy
Burton, MI 48529

Ryan Kelly
8884 Morning Mist Dr.
Clarkston, MI 48348-2868

SCP Distributors, LLC
c/o Scott R. Cheatham
Adams and Reese LLP
701 Poydras Street, Suite 4500
New Orleans, LA 70139-4596

SCP Pool Corp.
35015 Glendale St.
Livonia, MI 48150-1230

Sam Jarbo
33717 Woodward Ave
Ste 560
Birmingham, MI 48009-0913

Samantha Ceislak
1123 Hickory Ave.
Royal Oak, MI 48073-3290

Sandra M. Kelly
8884 Morning Mist Dr.
Clarkston, MI 48348-2868

Sandra M. Kelly
Ryan Kelly
8884 Morning Mist Dr.
Clarkston, MI 48348-2868

Shanna M. Kaminski
P.O. Box 247
Grass Lake, MI 49240-0247

Shannon Barnhardt
49739 Chaucher Court
Macomb, MI 48044-3899

Mark H. Shapiro
25925 Telegraph Rd.
Suite 203
Southfield, MI 48033-2527

Sheffiled
PO Box 25127
Winston Salem, NC 27114-5127

Simna Kumar
4424 Barchester Dr.
Bloomfield Hills, MI 48302-2115

Site One Landscape Supply
24110 Network Place
Chicago, IL 60673-1241

Stafford Landscaping LLC
PO Box 736
Memphis, MI 48041-0736

State of Michigan
Department of Attorney General
Cadillac Place
3030 West Grand Boulevard
Detroit, MI 48202-6030

State of Michigan
Department of Treasury
Collections Division
Treasury Building
Lansing, MI 48922-0001

State of Michigan
Department of Treasury
P.O. Box 77437
Detroit, MI 48277-0437

Stephanie Wells
19489 Waltham Rd.
Beverly Hills, MI 48025-5124

Stephanie Wells
19489 Waltham Road
Franklin, MI 48025-5124

Terry Riddle
7605 17 Mile Road
Sterling Heights, MI 48313-4533

The Hills of Lone Pine Association
c/o Norman Orr
201 West Big Beaver
Suite 600
Troy, MI 48063-2141

Tommisns Tounsel
13221 Maple Lawn Drive
Utica, MI 48315-2305

(p)US BANK
PO BOX 5229
CINCINNATI OH 45201-5229

U.S. Small Business Administration
2 North Street, Suite 320
Birmingham, AL 35203

U.S. Small Bussiness Administration
2 North street, Suite 320
Birmingham, AL 35203

Unique Funding Solution
71 S Central Ave
Suite 200
Valley Stream, NY 11580-5403

United States of America (IRS)
United States Attorney
211 W. Fort Street
Suite 2001
Detroit, MI 48226-3220

Upstart Loan Operations
PO Box 1503
San Carlos, CA 94070-7503

V Cap
333 Parsall Ave.
Cedarhurst, NY 11516-1842

Valley Transport
c/o Roberto Gonzalez
2001 Waterman
Detroit, MI 48209-1558

Changhua Wang
c/o Doron Yitzchaki, Esq.
Dickinson Wright PLLC
350 South Main Street
Suite 300
Ann Arbor, MI 48104-2131

Western Equipment Finance, Inc.
503 Highway 2 West
Devils Lake, ND 58301-2938

Western Equipment Finance, Inc.
P.O. Box 640
Devils Lake, ND 58301-0640

Wiegands Farm
32800 31 Mile Rd
Lenox, MI 48050-1302

Wright Engineering
1645 Village Center Circle
Ste 10
Las Vegas, NV 89134-6371

Doron Yitzchaki
Dickinson Wright PLLC
350 S. Main Street
Suite 300
Ann Arbor, MI 48104-2131

Michael I. Zousmer
Zousmer Law Group PLC
4190 Telegraph Road
Ste. 3000
Bloomfield Hills, MI 48302-2082

ally
PO Box 380902
Minneapolis, MN 55438-0902

c/o CRF Solutions
PO Box 1389
Simi Valley, CA 93062-1389

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

AmeriCredit Financial Services, Inc.
P.O. Box 183853
Arlington, TX 76096

(d)AmeriCredit Financial Services, Inc.
dba GM Financial
P O Box 183853
Arlington, TX 76096

Bill
6220 America Center Dr. Suite 100
San Jose, CA 95002

Citizens Bank, N.A.
One Citizens Plaza
Providence, RI 02903

Interal Revenue Service
Centralized Insolvency Operations
PO Box 21126
Philadelphia, PA 19114

Kabbage
730 Peachtree St NE, Suite 1100
Atlanta, GA 30308

U.S. Bank
800 Nicollet Mall
Minneapolis, MN 55402

(d)U.S. Bank National Association
Bankruptcy Department
PO Box 108
Saint Louis MO 63166-0108

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)23 Mile Storage, LLC	(u)24 Capital 1545 Route 202 Suite 101 NY 10907	(u)Ally Bank
(u)Ayham Ashkar 47681 Manorwood Drive Northvi	(u)EBF Holdings LLC	(u)Ernest M. Hassan III
(u)Amanda Pisarski	(u)SCP Distributors, LLC	(u)Mohamed Saad
(u)Angela Serrano	(d)Mark H. Shapiro 25925 Telegraph Rd. Suite 203 Southfield, MI 48033-2527	(u)Andrew R. Vara

End of Label Matrix	
Mailable recipients	166
Bypassed recipients	12
Total	178

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

Exigent Landscaping, LLC,

Debtor.

Case No. 23-46912-TJT
Chapter 7
Hon. Thomas J. Tucker

_____ /

EXHIBIT LIST

Exhibit	Description
A	SBA Collateral

Property Description

Raw materials (gravel, sand, pavers)

Misc. office furniture, incl conference table, 4 desks, 12 chairs

Office equipment, incl computers, printers, TV

(2) 20" Trailer, 18" Trailer, 16" Trailer, 10" Trailer

3 Trailers

2 Vacuum Paver Lifters

Topsoil Screener

2 Toro Dingo

Large Tamper

5 Small Tampers

5 Stihl saws

Rebar cutter and tier

2 Compressors

Misc. pool equipment and supplies

Misc. hand tools

Mud Buggy

Cat 308e2 Excavator - subject to \$14,000 lien of CAT